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T-046 P. 02/03 F-878

JUL 02 2003

GROUP 3600

PATENT

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

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Margaret A. Sullivan  
Name

Applicant : Koichiro Ikudome, et al.  
Application No. : 09/295,966  
Filed : April 21, 1999  
Title : USER SPECIFIC AUTOMATIC DATA REDIRECTION SYSTEM  
  
Grp./Div. : 3621  
Examiner : Pierre E. Elisca  
  
Docket No. : 34503/WWM/A522

**APPLICANTS' REPLY BRIEF**

Commissioner for Patents  
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Alexandria, VA 22313-1450

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June 30, 2003

Commissioner:

The Examiner's Answer mailed May 13, 2003 fails to respond to several arguments raised in Applicants' Appeal Brief and previous Responses to Office Actions. These arguments are discussed below. Some of these arguments have been made since the beginning of prosecution of this application and have never been addressed by the Examiner. The Examiner's Answer merely recites verbatim the wording of the Final Rejection. Applicants respectfully request that the claims be allowed because the Applicants' arguments are unrefuted or that prosecution be reopened so that these arguments may be addressed by the Examiner.

Specifically, the Examiner's Answer fails to address Applicants' argument discussed in relation to Group III (claims 15-29) that *Horowitz* contains no teaching or suggestion of "automated modification of at least a portion of the rule set correlated to the temporarily assigned network address." This limitation has, in fact, never been addressed by the Examiner, despite Applicants repeatedly bringing this limitation to the Examiner's attention since the beginning of prosecution. The Examiner has failed to show any teaching or suggestion in *Horowitz* of this limitation, and has not addressed this limitation at any point in the prosecution. Applicants respectfully request that the rejections to these claims, therefore, be withdrawn.

**Application No. 09/295,966**

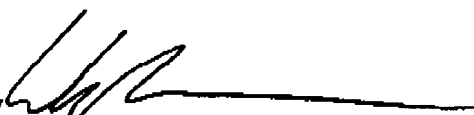
Regarding Group II (claims 5-6 and 12-13), Applicants repeatedly refuted the Examiner's argument, stating that not allowing a particular user into a zone is considered *redirection by the server* as the term "redirection" is used in the specification or in the art. Applicants pointed out in the Response to the Final Rejection and in the Appeal Brief that *Horowitz* did not teach or suggest this limitation, citing support in the specification. The Examiner's Answer, however, fails to address this argument or the support cited by the Applicants, and merely repeats verbatim the refuted argument from the Final Rejection. Because the Examiner has failed to refute Applicants' arguments, Applicants respectfully request that these claims be allowed.

Applicants also repeatedly refuted the Examiner's argument regarding Group I (claims 1-4, 7-11 and 14). Applicants pointed out in the Response to the Final Rejection and in the Appeal Brief that *Horowitz* does not teach or suggest "directing data to a public network." More specifically, Applicants argued that the "communication and network ports" in *Horowitz* cited by the Examiner are not used by *Horowitz* to direct data to a public network with specific reference to the relevant portions of *Horowitz* supporting Applicants' view. However, the Examiner did not address this detailed analysis of the *Horowitz* disclosure, but rather only repeated, verbatim, his previous language from the Final Rejection. Because the Examiner has failed to refute the Applicants' arguments, Applicants respectfully request that these claims be allowed.

For all of the foregoing reasons, the Examiner has not stated a *prima facie* case for obviousness and thus the claims should be allowed.

Respectfully submitted,

CHRISTIE, PARKER & HALE, LLP

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